

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

***In re: Terrorist Attacks on September 11, 2001* * Case No.: 03-md-1570
* (GBD) (SN)**

This document relates to:

Hugh A. Chairnoff, et alii, vs. Islamic Republic of Iran (1:18-cv-12371) (GBD) (SN)

JAMIE K. HAWKINS' DECLARATION OF FAMILIAL RELATIONSHIP

I, Jamie K. Hawkins, hereby declare under penalty of perjury, as provided for by 28 U.S.C., § 1746, that the following statements are true and correct, namely:

1. My name is Jamie K. Hawkins, and I am the daughter of Debra Guja, who was the wife of Geoffrey E. Guja, a firefighter, who died on 11 September 2001, when the World Trade Center collapsed. I submit respectfully this Declaration for the purpose of demonstrating that Geoffrey E. Guja was the functional equivalent of my father.

1. While Geoffrey E. Guja was not my biological father, for the reasons set forth below, my late stepfather, Geoffrey E. Guja, should be deemed the functional equivalent of my father.

2. I was born in Syosset, New York, in 1985, and my biological father was James Gelormino; however, when I was about 7 years old, my parents separated and I went to live with my maternal grandmother, in Massapequa Park, New York, for a period of approximately six months, while my mother drove me to school each day so that I could stay in the same school for the remainder of that school year, while my half-sister, Kelly Stevens, who is five years older than me, remained living with my biological father. Once I ceased living with my biological father, at or about the age of 7, my relationship with my biological father quickly dissipated to the point where I would see him on the order of once a year or thereabouts;

3. Then, in the late summer of 1993, when I was just about to start the 4th grade of my primary schooling, in 1993, my mother and I moved into Geoffrey E. Guja's home, in Lindenhurst, New York, which necessitated my changing elementary schools; Geoff immediately assumed the role of my father, welcoming me into his home with a memorable celebration of my eighth birthday, dressed in a chicken costume and presented me with a puppy, named "Simba," as a birthday present; attached hereto, as "Exhibit 'A'", are three cherished photographs from that birthday party, one depicting Geof wearing the chicken costume, and another depicting me hugging Simba, my new puppy given to me by Geoff.

4. Geoff would go on to host an elaborate celebration of my birthday for me and my friends, each summer, usually at Gilgo Beach, New York, entertaining us with his hilarious chicken costume.

5. Attached hereto, as "Exhibit 'B'", is a collage of photographs taken at my birthday parties in my teenage years, which capture the good times I had with Geoff at my birthday parties over the years, including a photograph of Geoff in his chicken costume.

6. Geoff married my mother on 24 October 1998, and he and my mom made me feel loved and very special on that happy occasion by including me in their wedding celebration, and, attached hereto, as "Exhibit 'C'", is a photograph of me with them on their wedding day.

7. As further evidence of the close and happy family life that I had with Geoff, I have attached hereto, as "Exhibit 'D,'" another collage of photographs from my family album which include, among others, a photograph of Geoff, my mom and me vacationing on a boat, and a photograph of Geoff and me painting Easter eggs, at a family resort in the Poconos, in Pennsylvania, when I was about 9 years old.

8. As I reflect upon my childhood as Geoff's daughter, I treasure all of my memories of him, as they were indeed happy times in which Geof taught me the importance of kindness and empathy, and helping me to value learning and becoming educated; for example, he had me assist in the annual Fire Department of New York Christmas food and toy drives, and he also took me to the library regularly throughout the rest of my elementary school years. With regard to my educational development, Geoff devoted untold attention, time and effort, encouraging and coaching me, and leading me to value education.

9. Examples of Geoff's exemplary role as my stepfather abound; he was there for all of the big events in my life, school events, birthdays, and family traumas, such as when he was part of my aunt's home hospice care when she was dying from cancer and in taking me to the hospital when I was stricken with a bout of appendicitis while my mother was at work.

Geof also taught me from a very young age to balance work with recreation; his motto was "work hard, play hard". Indicative of that was that, each summer, my mom, Geoff and I spent much time living on Geoff's houseboat, and we watched the Fourth of July fireworks display each summer from the houseboat, in New York Harbor.

10. The last major social event hosted for me by Geoff for me was my "sweet 16" birthday party, in August of 2001, less than a month before Geoff's untimely death on 11 September 2001.

11. When I learned that Geoff was missing, in the aftermath of the collapse of the World Trade Center Twin Towers, on 11 September 2001, like many other family members of firefighters who were missing and feared dead on that dark day, my mom and I were absolutely devastated and went to the FDNY Ten House and Saint Paul's Church, near Ground Zero, on a number of occasions, seeking information as to Geoff's fate.

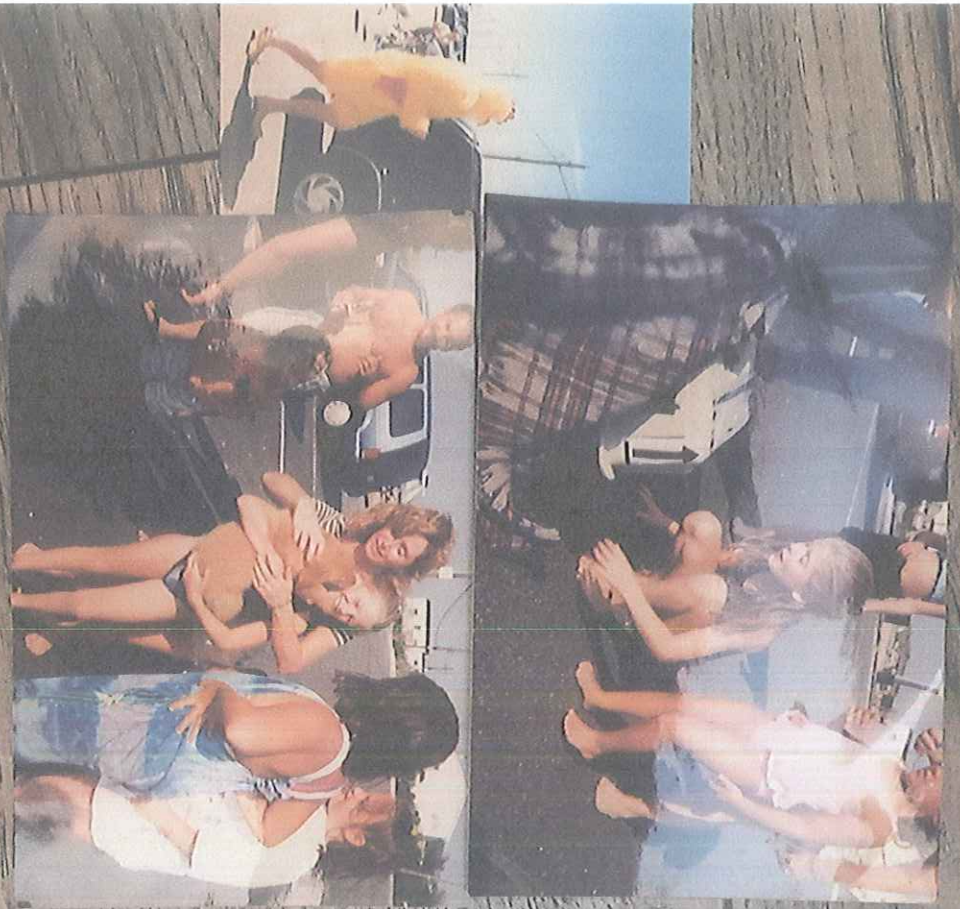
12. When it became apparent that Geoff had perished in the collapse of the Twin Towers, my mother and I both experienced tremendous grief, suffering and bereavement; however, I fervently believe that the confidence that I have found in my own life and my love of learning and community service which have led me to become a social worker, having earned a Master of Social Work degree from Adelphi University, have been a direct result of the guidance and example of my late stepfather, Geoffrey E. Guja, and that, but for him, my achievements and satisfaction in my personal life would not have been possible.

I, Jamie K. Hawkins, hereby declare, under the penalty of perjury, that the foregoing is accurate, true and correct.

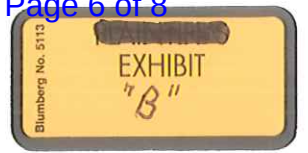
Dated: 7/23/2022



JAMIE K. HAWKINS



Geoff presenting
"Simba" to me as
my birthday gift
from him!
* I was about 8 years old,
approx 1993



Geoff in his Chicken Costume, a tradition he made for me.

• This is a few of the birthday parties he threw for me at the beach, on our boat

• Notice his costume
• Notice his interactions with my friends.





Mom & Geoff
wedding day

- I was "in" the bridal Party
- I was about 14 years old





Family Vacations

- Boat day together (age 13/14)
- Easter at a family resort in the Poconos
 - Painting eggs together (I was about 9 years old)

